UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA, *Plaintiff,*

v.

CRIMINAL CASE NO. 19-566 (FAB)

BRYAN G. DIAZ-DE JESUS, Defendant.

MOTION TO RESTRICT SENTENCING MEMORANDUM

TO THE HONORABLE FRANCISCO A. BESOSA UNITED STATES DISTRICT JUDGE FOR THE DISTRICT OF PUERTO RICO

COMES NOW, the appearing defendant, *Bryan G. Diaz-De Jesus*, by and through the undersigned attorney, respectfully states and prays as follows:

- 1. Pursuant to this Honorable Court's Standing Order #9, effective on February 1, 2013, all parties who wish to restrict the viewing by other parties of a document need to concurrently file with the document a motion requesting to restrict said document, stating the reasons that support the sealed or selected parties filing.
- 2. In compliance with the cited Order, a leave is hereby requested to file a Sentencing Memorandum.
- 3. The reason for the present request is that the filed Memorandum contains sensitive and confidential information concerning Mr. Diaz De Jesus. This information cannot be filed under a public document.
- 4. The cited confidentiality outweighs the presumption of public access as the information contained in the document is of a kind protected by federal law, as to which its release could cause harm to Mr. Diaz De Jesus.
- 5. It is humbly requested to limit the public access to view the document, except for the following

Case 3:19-cr-00566-FAB Document 52 Filed 06/11/21 Page 2 of 2

selected parties: U.S. Probation Office, authorized court personnel, USA Government Counsel and Mr. Diaz De Jesus.

WHEREFORE, it is very respectfully requested from this Honorable Court to grant the leave to file the requested Memorandum on a Sealed-viewing mode.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico on this 10th day of June 2021.

CERTIFICATE OF SERVICE

I hereby certify having filed this motion through the court's CM/ECF filing system that will notify all parties and counsel of record in this case.

/S/<u>Wilfredo Díaz Narváez</u>

Wilfredo Díaz--Narváez USDC-PR 215211 PO Box 31270 San Juan, PR 00929-2270 787-759-7269 Fax: 787-753-4598

attwdn@hotmail.com